

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

NATALIE REESER,

Plaintiff,

v.

HENRY FORD HOSPITAL,

Defendant.

Case No.: 2:14-cv-11916-GCS-MJH

Hon. George Caram Steeh

MILLER COHEN, P.L.C.

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STIPULATED PROTECTIVE ORDER

Upon the parties having agreed to the below terms for a protective order for the protection of medical information being released by the Plaintiff, it is ordered as follows:

IT IS ORDERED that the Defendant as well as counsel for Defendant and all other persons in receipt of Plaintiff's medical information, shall maintain such information in confidence and shall not disclose it to any other person, except as outlined below. The medical information shall constitute that information which is

released by the Plaintiff in document form, or information disclosed by Plaintiff verbally or in writing, that concerns her present or past medical conditions as well as any treatment therefor.

Defendant and its counsel shall only use the medical information of Plaintiff for purposes of this litigation, and shall not disclose said information to any other person. The only persons who may view Plaintiff's medical information are attorneys representing Defendant, designated agents of the Defendant for purposes of this litigation, clerical staff of Defendant's counsel, experts retained by Defendant or Defendant's counsel, or other persons hired by Defendant's counsel who are hired to assist with this litigation, the jury and this Court.

At the end of this litigation, Defendant's counsel shall return all copies of Plaintiff's medical information to Plaintiff, and not retain copies of such.

In the event that documents including Plaintiff's medical information are filed, they are to be sealed in accordance with the applicable court rule and/or rules; however, nothing in this Order shall restrict the rights of a party to use these materials at trial or to restrict the right of any party to file a motion in limine to limit the use of such materials at trial.

In the event that any person shall violate or threaten to violate any of the terms of the Order, the aggrieved party may seek an appropriate remedy from the Court, and no

signatory to this Order shall raise as a defense to a request for injunctive relief that the aggrieved party possesses an adequate remedy at law.

The terms of this Order shall be effective and the parties and their counsel shall be bound by the terms of this Order on the date the Order is signed by the parties' counsel. The terms of this Order shall not terminate at the conclusion of the Litigation.

SO ORDERED.

s/George Caram Steeh
Hon. George Caram Steeh
United States District Judge

Approved as to form and substance:

MILLER COHEN, P.L.C.

VARNUM LLP

By: /s/ Keith D. Flynn (w/consent)
Keith D. Flynn (P74192)

By: /s/ Terrence J. Miglio
Terrence J. Miglio (P30541)
Barbara E. Buchanan (P55084)

Dated: August 13, 2014